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To: Blaine Ipson
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Subject: George's Interview Questions

My thoughts:

Question 6 - Dense Pack.

It will not trigger NSR. NSR under PSD was legally avoided by utilizing the "WEPCO" rules for determining significant net emission increases (actuals-to-future-actuals test). We believe that with a little more fine tuning of combustion and pollution control equipment, there will not be a significant net increase in emissions due to the dense pack uprate project.

Question 7 - Operation

There are certain innovative operational strategies in place or being considered for emission controls. Fine tuning of boiler combustion is helping the low NOx burners to better control NOx. The addition of overfire air is also being considered. Wall rings installed in each scrubber module will help control slippage, removing more SO2. Forced oxidation of scrubber liquor is also being considered.

Question 9 - Environmental Systems.

Current permitted limits are 0.15 #/mmbtu and 90% removal for SO2, and 0.50 #/mmbtu for NOx. Upon completion of the dense pack project, we will have new limits of 0.138 #/mmbtu for SO2 and 0.461 #/mmbtu for NOx.

The plant was built with state-of-the-art pollution controls already in place. But other significant environmental investments since start-up include staffing a plant environmental team, a new Continuous Monitoring System for stack emissions,etc(help me out here)

Some environmental issues unique for this site include water rights issues, regional haze rules,etc

We did evaluate mercury emissions as part of EPA's information collection request in 1999. We performed fuel and stack testing and found a significant amount of mercury is removed from emissions by the present pollution control devices. Nearly 60% of the total mercury is removed in the baghouse fabric filter, and 70% of what's left is removed in the scrubber - an almost 90% total removal of mercury with existing equipment.

Question 12 - Challenges

The biggest challenge with regard to environmental issues is the inability to expand operation. Even if all of the latest and greatest pollution control equipment were utilized, it is near impossible to meet permitting requirements for an expansion under current regulations. Other issues include public education in light of special interest propagation of misleading propaganda. Also, as the plant ages, maintenance and operation of the pollution control equipment will become more challenging to meet the ongoing strict emission limits.